

Plaintiffs Altana Pharma AG and Wyeth (“Plaintiffs”) hereby reply to the counterclaims of defendant Sun Pharmaceutical Industries, Ltd. and Sun Pharmaceutical Advanced Research Centre, Ltd. (“Sun”) as follows:

1. Plaintiffs admit the allegations of paragraph 1.
2. Plaintiffs admit the allegations of paragraph 2.
3. Plaintiffs admit the allegations of paragraph 3.
4. Plaintiffs admit the allegations of paragraph 4.
5. Plaintiffs admit the allegations of paragraph 5.
6. Plaintiffs admit the allegations of paragraph 6.
7. Plaintiffs admit that Wyeth Pharmaceuticals, Inc. is a wholly-owned subsidiary of Wyeth, and holds an approved New Drug Application from the FDA for pantoprazole sodium delayed-release tablets. Plaintiffs deny the remaining allegations of paragraph 7.
8. Plaintiffs admit that Sun sent a notice to Plaintiffs in which Sun represented that it filed an ANDA for pantoprazole sodium. Plaintiffs deny each other allegation of paragraph 8.
9. Plaintiffs admit Sun’s notice letters were received by Altana on or about March 8, 2005, and by Wyeth on or about March 4, 2005. Plaintiffs deny each other allegation of paragraph 9.
10. Plaintiffs admit that Plaintiffs filed the present action on April 13, 2005, alleging, *inter alia*, infringement and willful infringement of the ‘579 patent.
11. Plaintiffs reallege each reply to each allegation of paragraphs 1-10 as if set forth specifically here verbatim.

12. Plaintiffs deny the allegations of paragraph 12.
13. Plaintiffs deny the allegations of paragraph 13.
14. Plaintiffs reallege each reply to each allegation of paragraphs 1-13 as if set forth specifically here verbatim.
15. Plaintiffs deny the allegations of paragraph 15.
16. Responding to Sun's requested relief, Plaintiffs deny that Sun is entitled to any relief whatsoever, whether as requested or otherwise.

Respectfully submitted,

Dated: June 15, 2005

s/ Andrew T. Berry (AB-4170)

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